Proposal Reviews

#259: Narrows 2 Powerplant Intake Extension

Yuba County Water Agency

Final Selection Panel Review	
Research and Restoration Technical Panel Review	
Sacramento Regional Review	
External Scientific Review	#1 #2 #3 #4
Prior Performance/Next Phase Funding	
Environmental Compliance	
Budget	

Final Selection Panel Review:

CALFED Bay-Delta 2002 ERP PSP
Final Selection Panel Review

Proposal Number: 259

Applicant Organization: Yuba County Water Agency

Proposal Title: Narrows 2 Powerplant Intake Extension

Please provide an overall evaluation rating.

Fund	
As Is	**-**
In Part	**-**
With Conditions	**-**
Consider as Directed Action	**-**
Not Recommended	**X**

Amount: **$0**

Conditions, if any, of approval (if there are no conditions, please put "None"):

None.

Provide a brief explanation of your rating:

The Selection Panel decided to not change its original rating because no technical issues to trigger a change were raised in the single public comment letter on this proposal. It refers to the Narrows 2 intake extension as providing a regional benefit as a consequence of the Regional Panel giving a high priority to most of a number of proposals that the commenter grouped with this proposal. Although the Regional Panel did recognize benefits of this particular proposed project, the panel gave this proposed project only a medium priority rating, making it a lower priority project relative to other projects endorsed by the commenter.

Research and Restoration Technical Panel Review:

CALFED Bay-Delta 2002 ERP PSP
Research and Restoration Technical Panel Review Form

Proposal Number: 259

Applicant Organization: Yuba County Water Agency

Proposal Title: Narrows 2 Powerplant Intake Extension

Review:

Please provide an overall evaluation summary rating:

Superior: outstanding in all respects;
Above Average: Quality proposal, medium or high regional value, and no significant administrative concerns;
Adequate: No serious deficiencies, no significant regional impediments, and no significant administrative concerns;
Not Recommended: Serious deficiencies, significant regional impediments or significant administrative concerns.

Overall Evaluation Summary Rating	**Provide a brief explanation of your summary rating**
-Superior	**Based on two concerns the panel does not recommend this project. 1) The impact on fish stocks in Yuba was not evaluated and, 2) the effect of deep water withdrawal on the thermal structure of the reservoir was not considered. With these two omissions the panel believed that the expected reduction in temperature was not adequately assessed and the impact on fish was not considered. With these omissions the case was not made that the intake extension would have a significant impact on the Yuba River fish populations and ecosystem.**
-Above average	
-Adequate	
XNot recommended	

1. **Goals and Justification.** Does the proposal present a clear statement of goals, objectives and hypotheses? Does the proposal present a clear justification and conceptual model for the project?

   Goal is clear: reduce water temperatures stressful to salmon in lower Yuba River with an intake extension that draws cool water into the powerhouse, thus cooling the river while still generating electricity. Water temperature continues to be a major concern in the Lower Yuba River (5 citations). Goal is timely and important, temperature is a limiting factor in salmon productivity.

   The hope is that the extension will lower temperature by several degrees, with largest decreases during periods of high temperature. A similar solution was implemented at Shasta Dam in 1997. Using a temperature model the impact of the extension on river temperatures was determined. The analysis also considered the impact of cool water releases upstream from the Colgate Powerhouse and the subsequent effect on the temperature of releases downstream at Narrows 2. Two scenarios estimated the minimum and maximum

temperature reductions (-1.7 to -6.4 oF). Downstream temperatures were also modeled. Reductions are less downstream.

2. **Likelihood of Success (Approach, Feasibility, Capabilities and Performance Measures).** Is the project likely to succeed based on the approach, feasibility and project team capabilities? Are the proposed performance measures adequate for measuring the project's success?

   The engineering aspects of the project are feasible. The proposal anticipates construction modifications contingent on weather and runoff. Project logistics were also considered; example barge launching. Alternative designs were considered and discarded because of issues with silt, debris and safety. Probability of installation success appears high.

   The panel questioned if the temperature reduction will have a significant impact on fish productivity and if the modeling of the temperature reduction was accurate. No measures were provided such as cumulative temperature stress or fractional reduction in growth as a result of temperature stress.

3. **Outcomes and Products.** Will the project advance the state of scientific knowledge in general and/or make an important contribution to the state of knowledge of the Bay-Delta Watershed? For restoration proposals, is the project likely to contribute to ecosystem restoration or species recoveries in a significant way? Will the project produce products useful to decision-makers and scientists?

   Products include: design specifications, quarterly reports and monitoring evaluation plans and reports. The project will not advance the state of scientific knowledge. It is unclear if the project will have a significant contribute to ecosystem restoration and species recovery. Temperature reductions were estimated between 1.7 and 6.4 degrees F and further downstream the reductions will be less yet. Considering that the effect of vertical mixing resulting from the deepwater intake was not considered in the analysis, the panel believes that the reductions are more likely to be below 2 degrees F and maybe less. Is this reduction ecologically significant? This important question was not addressed.

4. **Cost/Benefit Comments.** Is the budget reasonable and adequate for the work proposed?

   The project total is $4.7 million; YCWA has secured $1.5 million leaving $3.2 million in the request. This is a 32% cost share. The budget seems reasonable. However since the impacts to the fish populations were not considered it is not possible to evaluate the project benefits.

5. **Regional Review.** How did the regional panel(s) rank the proposal (High, Medium, Low)? Did the regional panel(s) identify significant benefits (regional priorities, linkages with other activities, local involvement) or impediments (local constraints, conflicts with other activities, lack of local involvement) to this proposal? What were they?

   The Regional Review rated the project medium priority, expressing concern that the true need was not established. It appeared the project did not have strong local support.

6. **Administrative Review.** Were there significant concerns about the proposal with regard to the prior performance, environmental compliance and budget administrative reviews? What were they?

   No significant administrative issues were identified.

Miscellaneous comments:

None

Sacramento Regional Review:

Proposal Number: 259

Applicant Organization: Yuba County Water Agency

Proposal Title: Narrows 2 Powerplant Intake Extension

Overall Ranking: **-**Low **X**Medium **-**High

Provide a brief summary explanation of the committee's ranking:

The panel felt it was medium priority. However, this project is of concern technically because of a lack of understanding as to the true need, and the sufficiency of the existing information. Another issue is concern that spending a bunch of money on improvements at Englebright Dam would influence decisions regarding future actions at the dam, especially when there is a CALFED directed program looking into re-introduction of salmonids above Englebright.

1. Is the project feasible based on local constraints?

   -Yes **X**No

   How?

   Physically yes. Politically, no. Local technical groups have been working to determine need, verify benefits, and determine if current information is sufficient to make decisions of this magnitude on.

2. Does the project pursue the restoration priorities applicable to the region as outlined in the PSP?

   XYes **-**No

   How?

   This proposal meets PSP priority Sac Region-2 for spring-run.

3. Is the project adequately linked with other restoration activities in the region, such as ongoing implementation projects and regional planning efforts?

   XYes **-**No

   How?

   This project is linked with the Lower Yuba Restoration efforts, but not with the Upper Yuba Studies Program.

4. Does the project adequately involve local people and institutions?

   XYes **-**No

How?

X

Other Comments:

X

External Scientific: #1

Research and Restoration External Scientific Review Form

Proposal Number: **259**

Applicant Organization: **Yuba County Water Agency**

Proposal Title: **Narrows 2 Powerplant Intake Extension**

Conflict of Interest Statements:
I have no financial interest in this proposal.
XCorrect
-Incorrect

In the blank below please explain any connection to proposal, to applicant, co-applicant or subcontractor or to submitting institution (write "none" if no connection):

none

Review:

Please provide an overall evaluation summary rating:

Excellent: outstanding in all respects;
Good: quality but some deficiencies;
Poor: serious deficiencies.

Overall Evaluation Summary Rating	**Provide a brief explanation of your summary rating**
XExcellent	**This was an excellent proposal with no flaws that I could detect within the limits of my knowledge.**
-Good	
-Poor	

1. **Goals.** Are the goals, objectives and hypotheses clearly stated and internally consistent? Is the concept timely and important?

   Goal is clear: reduce water temperatures stressful to salmon in lower Yuba River with an intake extension to draw cool water into the powerhouse thus cooling the river and still generating electricity. Water temperature continues to be a major concern in the Lower Yuba River (5 citations). Goal is timely and important, temperature is a limiting factor in salmon productivity, and the possibility of increased demand for the water resource and expected increase in temperatures make this an important project.

2. **Justification.** Is the study justified relative to existing knowledge? Is a conceptual model clearly stated in the proposal and does it explain the underlying basis for the proposed work? Is the selection of research, pilot or demonstration project, or a full-scale implementation project justified?

The existing knowledge indicates temperature is a problem in Lower Yuba River. The extension will lower temperature by several degrees, with largest decreases during periods of high temperature. A similar solution was implemented at Shasta Dam in 1997. The structure is working successfully. This is a very straightforward project. Using a temperature model the impact of the extension on river temperatures was determined. The analysis also considered the impact of cool water releases upstream from the Colgate Powerhouse and the subsequent effect on the temperature of releases at the downstream Narrows with an intake extension. Two scenarios were address characterizing the minimum and maximum effect of temperature reduction from the two dam complex. Reduction in temperature range from -1.7 to -6.4 oC. This analysis demonstrated that considerable planning has gone into this project. Down stream temperatures were also modeled. The effects of the temperature reduction on the fisheries were also discussed. The review was adequate but not extensive. This was not a negative however. Refreshing in its honesty was a statement that the effects of the temperature, while clearly beneficial at high temperatures the overall effects are uncertain. The biological response is more uncertain than the engineering response and the applicants noted this. They have however, noted their monitoring program, which will continue to document the effect of the project on fish populations. Monitoring activities include carcass surveys, population estimates redd surveys and juvenile population monitoring, redd dewatering and fish stranding. Details on monitoring were not included. The significant background done on this issue justifies a full-scale implementation.

3. **Approach.** Is the approach well designed and appropriate for meeting the objectives of the project? Are results likely to add to the base of knowledge? Is the project likely to generate novel information, methodology or approaches? Will the information ultimately be useful to decision-makers?

   The construction of the extension intake is described in detail with design drawings by Jones & Stokes, a well respected international construction company. A detailed construction schedule is included. The approach is undoubtedly standard in the construction industry. The approach has use to decision makers as example for what fisheries projects should aspire to achieve. Monitoring and evaluation of temperature is described and a statistical approach for evaluation is discussed and will continue for 3 years. The end result will be clear information on the effectiveness of the intake extension for temperature

4. **Feasibility.** Is the approach fully documented and technically feasible? What is the likelihood of success? Is the scale of the project consistent with the objectives?

   A feasibility analysis is complete and anticipates construction modifications contingent on weather and runoff. Project logistics were also considered; example barge launching. Alternative designs were considered and discarded because of issues with silt, debris and safety. Probability of success seems high.

5. **Project-Specific Performance Measures.** Does the project include appropriate performance measures to measure success relative to the project's goals and objectives? Is there enough detail as to how the performance measures will be quantified? For restoration projects, are monitoring plans explicit and detailed enough to determine if performance measures will be adequately assessed?

   Both temperature and biological performance measures are identified. Temperature measures are established by the temperature modeling detailed in the proposal. Biological performance measures are less precise and will compare the above mentioned measures before and after the project. The measures, while strongly influenced by demographic and climatic/oceanographic factors, are reasonable and adequate.

6. **Products.** Are products of value likely from the project? Specifically for restoration projects, are products of value also likely from the monitoring component? Are interpretative outcomes likely from the project?

   Products include: design specifications, quarterly reports and monitoring evaluation plans and reports.

7. **Capabilities.** What is the track record of applicants in terms of past projects? Is the project team qualified to efficiently and effectively implement the proposed project? Do they have available the infrastructure and other aspects of support necessary to accomplish the project?

   The Yuba County Water Agency has two contracts from CALFED one for engineering work one for fish monitoring. No contractor for construction phase has been selected as yet but reasonable, and I presume standard, criteria for the selection process were described.

8. **Cost/Benefit Comments.** Is the budget reasonable and adequate for the work proposed?

   The project total is $4.7 million; YCWA has secured $1.5 million leaving $3.2 million in the request. This is a 32% cost share. The budget seems reasonable.

Miscellaneous comments:

This proposal is very well developed.

External Scientific: #2

Research and Restoration External Scientific Review Form

Proposal Number: **259**

Applicant Organization: **Yuba County Water Agency**

Proposal Title: **Narrows 2 Powerplant Intake Extension**

Conflict of Interest Statements:
I have no financial interest in this proposal.
XCorrect
-Incorrect

In the blank below please explain any connection to proposal, to applicant, co-applicant or subcontractor or to submitting institution (write "none" if no connection):

none

Review:

Please provide an overall evaluation summary rating:

Excellent: outstanding in all respects;
Good: quality but some deficiencies;
Poor: serious deficiencies.

Overall Evaluation Summary Rating	**Provide a brief explanation of your summary rating**
-Excellent	**Very good--I gave a very good because I think the project is worthwhile. However, I dont think the applicants were convincing in their rationale for linking intake and discharge relationships. I also wonder of the applicability to this solicitation.**
XGood	
-Poor	

1. **Goals.** Are the goals, objectives and hypotheses clearly stated and internally consistent? Is the concept timely and important?

   Rating: Good. The goals and objectives are fine as stated for moving a potentially harmful intake into deeper waters (as per the 316b regs), especially with viable populations of anadromous fish. However, I am skeptical as to how much influence the intake will have on the discharge temperatures without knowing more about the operating characteristics.

2. **Justification.** Is the study justified relative to existing knowledge? Is a conceptual model clearly stated in the proposal and does it explain the underlying basis for the proposed work? Is the selection of research, pilot or demonstration project, or a full-scale implementation project justified?

Rating: Very Good. I think this project is justified. However, questions are raised as to the comparison between the Narrows 2 plant and the Colgate plant relevant to design features, operation, etc.

3. **Approach.** Is the approach well designed and appropriate for meeting the objectives of the project? Are results likely to add to the base of knowledge? Is the project likely to generate novel information, methodology or approaches? Will the information ultimately be useful to decision-makers?

   Rating: Very Good. As laid out, the approach is very good.

4. **Feasibility.** Is the approach fully documented and technically feasible? What is the likelihood of success? Is the scale of the project consistent with the objectives?

   Rating: Good. It is feasible to move the intake. But, I am not sure if achievement of the objectives of reducing discharge temperatures is feasible. I am not convinced from the information presented.

5. **Project-Specific Performance Measures.** Does the project include appropriate performance measures to measure success relative to the project's goals and objectives? Is there enough detail as to how the performance measures will be quantified? For restoration projects, are monitoring plans explicit and detailed enough to determine if performance measures will be adequately assessed?

   Rating: Excellent. Performance measures appear to be in place for this project.

6. **Products.** Are products of value likely from the project? Specifically for restoration projects, are products of value also likely from the monitoring component? Are interpretative outcomes likely from the project?

   Rating: Very Good. Some explanation of detail of the reports would be useful. How the data reports are to be interpreted in the context of the objectives and performance of the conceptual model is important.

7. **Capabilities.** What is the track record of applicants in terms of past projects? Is the project team qualified to efficiently and effectively implement the proposed project? Do they have available the infrastructure and other aspects of support necessary to accomplish the project?

   Rating: No way to evaluate contractor not yet selected.

8. **Cost/Benefit Comments.** Is the budget reasonable and adequate for the work proposed?

   Rating: No comment.

Miscellaneous comments:

External Scientific: #3

Research and Restoration External Scientific Review Form

Proposal Number: **259**

Applicant Organization: **Yuba County Water Agency**

Proposal Title: **Narrows 2 Powerplant Intake Extension**

Conflict of Interest Statements:
I have no financial interest in this proposal.
XCorrect
-Incorrect

In the blank below please explain any connection to proposal, to applicant, co-applicant or subcontractor or to submitting institution (write "none" if no connection):

none

Review:

Please provide an overall evaluation summary rating:

<u>Excellent:</u> outstanding in all respects;
<u>Good:</u> quality but some deficiencies;
<u>Poor:</u> serious deficiencies.

Overall Evaluation Summary Rating	**Provide a brief explanation of your summary rating**
-Excellent	**There are some uncertainties in attaining biologically important downstream temperature reductions and in changing the lake's vertical temperature profile by mixing which weaken the proposal.**
XGood	
-Poor	

1. **<u>Goals.</u>** Are the goals, objectives and hypotheses clearly stated and internally consistent? Is the concept timely and important?

   The goals are clear and meet an identified need for improving temperature conditions below the reservoir.

2. **<u>Justification.</u>** Is the study justified relative to existing knowledge? Is a conceptual model clearly stated in the proposal and does it explain the underlying basis for the proposed work? Is the selection of research, pilot or demonstration project, or a full-scale implementation project justified?

   There is ample data on the critical role of temperature to salmon life history and other aquatic organisms. The proposal is weaker on analysis of release timing with existing downstream temperatures to show how these solve critical periods in salmon life history.

3. **Approach.** Is the approach well designed and appropriate for meeting the objectives of the project? Are results likely to add to the base of knowledge? Is the project likely to generate novel information, methodology or approaches? Will the information ultimately be useful to decision-makers?

   Construction and engineering are common and easily accomplished baring extreme weather events. There may be some concern about new mixing regimes in the Englebright water column so that water from Bullards Bar is warmed more than under existing operations. Other studies have found lakewide changes in thermal layers as a result of deep water removal and more extensive mixing which could change temperature profiles from those observed in the past. As a consequence, the cool water inflows from Bullards Bar may not provide the same level of cool water reserve as expected. This factor was not discussed and existing lake temperature data are apparently limited to documenting vertical stratification at a single station.

4. **Feasibility.** Is the approach fully documented and technically feasible? What is the likelihood of success? Is the scale of the project consistent with the objectives?

   There are uncertainties due to lake mixing and whether downstream temperature reductions will be biologically significant.

5. **Project-Specific Performance Measures.** Does the project include appropriate performance measures to measure success relative to the project's goals and objectives? Is there enough detail as to how the performance measures will be quantified? For restoration projects, are monitoring plans explicit and detailed enough to determine if performance measures will be adequately assessed?

   The project can measure its design goals, but if it fails, there is little low-cost alternative for improvement.

6. **Products.** Are products of value likely from the project? Specifically for restoration projects, are products of value also likely from the monitoring component? Are interpretative outcomes likely from the project?

   The biological importance for designed temperature reductions are unclear. Existing monitoring cannot separate temperature effects from other factors. Planned measurement of temperature profiles within the lake are not likely to reveal changing patterns of lake mixing and past monitoring appears limited to a single station vertical profile.

7. **Capabilities.** What is the track record of applicants in terms of past projects? Is the project team qualified to efficiently and effectively implement the proposed project? Do they have available the infrastructure and other aspects of support necessary to accomplish the project?

   The proponents have excellent expertise for directing and managing construction in hydro related projects and they have a well established network of collaborators for monitoring.

8. **Cost/Benefit Comments.** Is the budget reasonable and adequate for the work proposed?

   The cost is high for an incompletely known biological improvement downstream. New mixing patterns within the lake could reduce expected temperature benefits.

Miscellaneous comments:

There are two areas of uncertainty not fully addressed in the proposal. The engineering solution may be the best available but the eventual benefits require additional analysis and prediction.

External Scientific: #4

Research and Restoration External Scientific Review Form

Proposal Number: **259**

Applicant Organization: **Yuba County Water Agency**

Proposal Title: **Narrows 2 Powerplant Intake Extension**

Conflict of Interest Statements:
I have no financial interest in this proposal.
XCorrect
-Incorrect

In the blank below please explain any connection to proposal, to applicant, co-applicant or subcontractor or to submitting institution (write "none" if no connection):

none

Review:

Please provide an overall evaluation summary rating:

<u>Excellent:</u> outstanding in all respects;
<u>Good:</u> quality but some deficiencies;
<u>Poor:</u> serious deficiencies.

Overall Evaluation Summary Rating	**Provide a brief explanation of your summary rating**
XExcellent	**If it is desired to assure no possible chance of any possible adverse impacts on salmonind stocks downstream of dam as a result of water temperature increases and the water temperatures will now more closely approximate what existed prior to construction of the dams.**
-Good	
-Poor	

1. **<u>Goals.</u>** Are the goals, objectives and hypotheses clearly stated and internally consistent? Is the concept timely and important?

   Yes, the goals, objectives and hypotheses are clearly stated and internally consistent. Importance relates to how much change in water temperatures will occur compared to those that salmonids encountered prior to construction of the dams.

2. **<u>Justification.</u>** Is the study justified relative to existing knowledge? Is a conceptual model clearly stated in the proposal and does it explain the underlying basis for the proposed work? Is the selection of research, pilot or demonstration project, or a full-scale implementation project justified?

Yes, if this will provide water temperatures that are much closer to levels that salmon encountered prior to construction of the dams.

3. **Approach.** Is the approach well designed and appropriate for meeting the objectives of the project? Are results likely to add to the base of knowledge? Is the project likely to generate novel information, methodology or approaches? Will the information ultimately be useful to decision-makers?

   This is a construction project and won't increase state of knowledge about potential decreases in water temeperature on salmonid stocks downstream of the project.

4. **Feasibility.** Is the approach fully documented and technically feasible? What is the likelihood of success? Is the scale of the project consistent with the objectives?

   yes.

5. **Project-Specific Performance Measures.** Does the project include appropriate performance measures to measure success relative to the project's goals and objectives? Is there enough detail as to how the performance measures will be quantified? For restoration projects, are monitoring plans explicit and detailed enough to determine if performance measures will be adequately assessed?

   It is not clear what were the historic water temperatures in the river downstream of the dam and whether the decrease un water temperatures from th eintake structure will provide temperatures closer to historic levels.

6. **Products.** Are products of value likely from the project? Specifically for restoration projects, are products of value also likely from the monitoring component? Are interpretative outcomes likely from the project?

   It depends on the likihood of avoiding powerhouse outages, which appear low.

7. **Capabilities.** What is the track record of applicants in terms of past projects? Is the project team qualified to efficiently and effectively implement the proposed project? Do they have available the infrastructure and other aspects of support necessary to accomplish the project?

   Unknown.

8. **Cost/Benefit Comments.** Is the budget reasonable and adequate for the work proposed?

   unknown.

Miscellaneous comments:

Prior Performance/Next Phase Funding:

New Proposal Number: 259

New Proposal Title: Narrows 2 Powerplant Intake Extension

1. Prior CALFED project numbers, titles, and programs: (*list only projects for which you are the contract manager*)

   ERP 98-N03 - Life History and Stock Composition of Steelhead

2. Prior CVPIA project numbers, titles, and programs: (*list only projects for which you are the contract manager*)

   N/A

3. Have negotiations about contracts or contact amendments with this applicant proceeded smoothly, without persistent difficulties related to standard contract terms and conditions?

   XYes **-**No **-**N/A

   If no, please explain any difficulties:

4. Are the status, progress, and accomplishments of the applicant's current CALFED or CVPIA project(s) accurately stated?

   XYes **-**No **-**N/A

   If no, please explain any inaccuracies:

5. Is the applicant's progress towards these project(s)' milestones and outcomes to date satisfactory?

   -Yes **X**No **-**N/A

   If no, please explain deficiencies:

   Steelhead Trapping by Jones Stokes & Associates is indefinately halted due to Endangered Species permitting delays.

6. Is the applicant's reporting, records keeping, and financial management of these projects satisfactory?

   XYes **-**No **-**N/A

   If no, please explain deficiencies:

7. Will the project(s) be ready for next phase funding in 2002, based on its current progress and expenditure rates?

XYes **-**No **-**N/A

If no, please explain:

Other Comments:

The work is being subcontracted to Jones & Stokes Associates. Yuba County Water Agency has not been heavily involved in project management.

Environmental Compliance:

Proposal Number: 259

Applicant Organization: Yuba County Water Agency

Proposal Title: Narrows 2 Powerplant Intake Extension

1. Are the legal or regulatory issues that affect the proposal identified adequately in the proposal?

   XYes **-**No

   If no, please explain:

2. Does the project's timeline and budget reflect adequate planning to address legal and regulatory issues that affect the proposal?

   XYes **-**No

   If no, please explain:

3. Do the legal and regulatory issues that affect the proposal significantly impair the project's feasibility?

   -Yes **X**No

   If yes, please explain:

Other Comments:

Budget:

Proposal Number: 259

Applicant Organization: Yuba County Water Agency

Proposal Title: Narrows 2 Powerplant Intake Extension

1. Does the proposal include a detailed budget for each year of requested support?

   XYes **-**No

   If no, please explain:

2. Does the proposal include a detailed budget for each task identified?

   XYes **-**No

   If no, please explain:

3. Does the proposal clearly state the type of expenses encompassed in indirect rates or overhead costs?

   XYes **-**No

   If no, please explain:

   A percentage rate is not listed - overhead is displayed as one flat rate per task. Appears to be less than 1% of the entire project and the Budget Justification lists doc printing, per diem & expenses, contractor's office overhead, supplies & services as overhead costs.

4. Are appropriate project management costs clearly identified?

   XYes **-**No

   If no, please explain:

5. Do the total funds requested (Form I, Question 17A) equal the combined total annual costs in the budget summary?

   -Yes **X**No

   If no, please explain (for example, are costs to be reimbursed by cost share funds included in the budget summary).

   356,856.00 difference, unclear as to why there is a difference in totals based on what's listed in the budget summary, project description and budget justification.

6. Does the budget justification adequately explain major expenses?

   XYes **-**No

   If no, please explain:

7. Are there other budget issues that warrant consideration?

   XYes **-**No

   If yes, please explain:

   The budget summary does not include costs for "other direct costs" but states under the Budget Justification that ..."Project contingencies (10%) are included under other direct costs".

   The total salaries listed under Budget Summaries include... " benefits, overhead, indirect costs associated with salaries and reasonable profits."

   see no. 3 comments for overhead rates.

Other Comments: